



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

D-AFS-K65189-CA

960367

OCT 21 1996

John Bradford
Foresthill Ranger District
Tahoe National Forest
22830 Foresthill Road
Foresthill, CA 95631

Dear Mr. Bradford:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the project entitled **Cavanah Multi-Resource Management Project, Foresthill Ranger District, Tahoe National Forest, CA**. Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The Forest Service proposes a number of management actions to harvest wood products, reduce hazardous fuel loadings, and improve wildlife habitat within the Cavanah analysis area. All action alternatives would improve woody violet habitat; remove trees infested with mistletoe, bark beetles, annosus root disease, and white pine blister rust; improve tree species composition through regeneration plantings; reduce stocking in dense plantations; regenerate areas with low stocking; improve deer forage quality and quantity through shrub mastication and burning; enhance scenic quality; reconstruct, construct, and decommission roads; and upgrade the 43 Road from Robinson Flat to Flat Ravine. In addition, Alternatives B and D propose to reduce fuels by creating a Defensible Fuels Profile Zone (DFPZ) and fuels reduction zone (FRZ). Four alternatives are evaluated: Alternative A - No Action, Alternative B - all proposed activities would be implemented, Alternative C - emphasis on watershed/soils protection while reducing fuels through reduced activity in watersheds over threshold, and Alternative D - emphasis on fuels reduction and the DFPZ. Alternative C is the Forest Service's preferred alternative.

We commend the Forest Service for their multi-resource approach. EPA strongly advocates the use of an ecosystem management, watershed approach where proposed actions are developed and evaluated within the context of the overall watershed resources, values, needs, and desired condition. We also support adaptive management and the development of creative methods for addressing hazardous fuel loadings, fish and wildlife habitat needs, and forest health. Although the DEIS proposes management activities for multiple resources, we are concerned because an ecosystem watershed approach is not clearly evident in the DEIS. Instead, the proposed management activities appear to be a collection of desired actions which may or may not be interrelated or integrated into an overall watershed management plan.

In addition, the DEIS clearly states that most of the analysis area exceeds watershed thresholds due to past activities such as mining, grazing, and timber harvest. Channel downcutting, sedimentation, and loss of fishery habitat are widespread problems (pg. III-33 to

III-48). Additional management activity would further degrade these watersheds. Thus, we are very concerned with the proposed management activity and urge extreme caution. We recognize that Alternative C would have the least potential impact. However, given the existing degraded conditions, we strongly recommend consideration of a phased approach plus more actions which will address existing problems, e.g. restoration projects, additional road obliterations, reduced grazing, mine closures, reduced mining activity and additional mining restrictions, and sedimentation control projects.

Because of the above concerns, we have classified this DEIS as category EC-2, Environmental Concerns - Insufficient Information (see attached "Summary of the EPA Rating System"). We appreciate the opportunity to review this DEIS. Please send one copy of the Final EIS to this office at the same time it is officially filed with our Washington, D.C. office. If you have questions, please call me at (415) 744-1584, or invite your staff to call Ms. Laura Fujii of my staff at (415) 744-1579.

Sincerely,



David J. Farrel, Chief
Federal Activities Office

Enclosure: (3 pages)

Filename: cavanah.dei
MI002648

cc: USFWS, Sacramento
CDFG, Sacramento
RWQCB, Region 5, Central Valley
Friends of the River

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION

Environmental Impact of the Action

LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of environmental quality, public health or welfare. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommend for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1-Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From: EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

COMMENTS

1. Given the existing degraded watershed conditions, we strongly recommend minimization of repeat management entries and treatments. Regeneration activities are proposed to increase species diversity and to address low stocking areas. The DEIS should describe whether regeneration activities include repeat release entries and the level of herbicide use, if any. In watersheds over threshold, EPA strongly recommends use of manual release methods and as few entries as possible to achieve the desired conditions.

2. The proposed harvest prescriptions and management activities are very complex. Successful implementation of these actions are highly dependent on accurate tree marking, effective sale administration, and competent implementation and effectiveness monitoring. Given this complexity and the low benefit/cost ratios of the proposed alternatives (pg. IV-65), the Forest Service should describe in the FEIS the realistic feasibility of the proposed management actions. Include a description of proposed fall back options if implementation errors (e.g., mismarked trees) occur or if there is a no bid sale.

Adequate training of marking crews, harvest crews, and contractors is also critical; especially given the shift in management focus from timber products to forest health and reduced fuel loading. We recommend the FEIS outline the type of training which will be provided to contractors and harvest crews to ensure they fully understand the project objectives and future desired conditions.

Past timber harvest practices are considered one of the causes of existing excessive fuel loads and poor watershed health. A common problem has been inadequate cleanup of timber harvest activity fuels and lack of implementation of post-harvest fuel reduction actions (e.g., removal of slash and small material not harvested). The FEIS should discuss this problem and evaluate the availability of funds and regulations to guarantee proposed follow-up treatments are implemented. We strongly recommend the Forest Service continue to develop methods to ensure that harvest activities are used as tools to achieve forest health and provide sustainable benefits to local communities, instead of activities which add to the forest health problem.

3. Given the low benefit/cost ratios of the project alternatives and the conglomerate of proposed actions, we suggest the Forest Service consider flexible contracting mechanisms to maximize the ability to achieve the project objectives. Suggestions which have been made by the Northern California Provincial Advisory Teams chartered pursuant to the Northwest Forest Plan include:

- Use of comprehensive forest health or stewardship contracts where one or two contractors would accomplish all of the management needs within a project area.
- Avoid Brush Disposal (BD) and Kundsens-Vanderberg (KV, funds for post harvest work) collections and instead have those needs accomplished through the forest health contract.
- Offer the contracts in a manner to provide maximum opportunity to utilize favorable market trends, e.g., long-term contracts or contracts with flexible accomplishment targets depending on market conditions.
- Offer the contracts in a manner that provides the maximum opportunity for small and local contractors.

-- Actual fire use should not be part of the contract but should be an activity for Forest Service crews. Sufficient funds should be retained by the Forest Service for the necessary fire/fuels work and monitoring.

4. We recommend the following items be included in the FEIS to improve understanding of the proposed management actions:

- Summary chart of environmental consequences by alternative. While the narrative description of environmental consequences for each alternative is adequate, it does not provide a clear picture of the trade-offs and differences between alternatives.
- Illustrations of proposed harvest prescriptions; e.g., group selection, thinning from below, thinning from above, group regeneration.
- Appendix with the detailed mitigation and monitoring plan. The mitigation and monitoring plan should include detailed information on what action will be taken, who will take the action, where it will be taken, and when. It is also helpful if reporting form samples are included.